

Application No.: 09/546,981

Docket No.: 20421-00061

REMARKS

Claims 1-16 are pending in the application. The specification and claims 1, 7 and 11 have been amended by the present amendment.

In the April 2, 2004, Office Action, an amendment to the specification was objected to and claims 1-16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nagami et al (U.S. Patent No. 6,343,322).

In response to the objection to the specification that indicated the "noted passage does not support the specification as amended," the amended language has been removed from the specification. Therefore, the amendment of the specification raises no question of new matter.

Rejections under 35 U.S.C. §112

Claims 1, 7 and 11 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully traverse.

Claims 1, 7 and 11 have been amended to clarify the invention. In particular, claims 1 and 11 have been amended to recite:

performing logical bridging of data frames destined for or originating from said control point in a network processor directly connected to said control point, said network processor directly connected to said control point further comprising ~~an L2-table~~ a logical bridge and a media access control (MAC) address database, and sending data frames to a logical router in another network processor with an L3 table when for all L3 processing, wherein said network processor directly connected to said control point is free of an L3 table.

Claim 7 has been amended with similar language. Support for the amendments is provided at least at page 5, line 22 to page 6, line 7; and shown at least in Fig. 2 at references 205, 206, 213 and 214; and page 7, lines 8-17. Therefore, the amendment raises no question of new matter.

Rejections under 35 U.S.C. §103

Claims 1-16 were rejected under 35 U.S.C. §102(e) as being anticipated by Nagami et al. Applicants respectfully traverse.

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Nagami et al discloses a packet transfer scheme for transferring packets at a boundary of a plurality of networks.¹ In particular, Nagami et al discloses a network layer control unit 207 connected to a network layer switch unit 204; the network layer switch unit 204 connected to a datalink layer-network layer translation unit 203; and the datalink layer-network layer translation unit 203 connected to a datalink layer switch unit 202.²

In addition, Nagami et al discloses the network layer control unit 207 has a function for managing an L3 routing table provided in the network layer switch unit 204.³ Further, the Office Action of September 22, 2003, suggests the network layer control unit 207 of Nagami et al is analogous to the "control point" of the claimed invention.⁴ Therefore, Nagami et al discloses each network processing unit includes an L3 routing table that is managed by a control point unit 207.

However, Nagami et al nowhere discloses, as recited in amended claims 1 and 11:

performing logical bridging of data frames destined for or originating from said control point in a network processor directly connected to said control point, said network processor directly connected to said control point further comprising a logical bridge and a media access control (MAC) address database, and
sending data frames to a logical router in another network processor with an L3 table for all L3 processing,
wherein said network processor directly connected to said control point is free of an L3 table (emphasis added).

In addition, amended independent claim 7 recites:

wherein a network processor directly connected to said control point performs logical bridging functions needed by said control point, said network processor further comprising a logical bridge and a media access control (MAC) address database and
wherein said network processor directly connected to said control point is free of an L3 table and sends data frames to a logical router in another network processor with an L3 table for all L3 processing.
(emphasis added).

That is, in contrast to the claimed invention, Fig. 4 of Nagami et al nowhere discloses network processors only performing logical bridging at an L2 layer (i.e., data link layer with MAC Addresses) where the "network processor directly connected to said control point is free of an L3

¹ Nagami et al at Abstract.

² *Id.* at Fig. 4, column 8, lines 54-67.

³ *Id.* at Fig. 4, ref. 207; column 9, lines 65-66.

⁴ Outstanding Office Action mailed September 22, 2003, at page 1, paragraph 4, lines 3-6.

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table,” and “sending data frames to a logical router in another network processor with an L3 table for all L3 processing,” as recited in amended claims 1 and 11, and as recited with similar language for claim 7.

Moreover, Nagami et al discloses the network layer control unit 207 manages the L3 routing table using existing routing protocols such as Opens Shortest Path First (OSPF).⁵ In contrast to Nagami et al, the claimed invention: (1) does not include an L3 table; and (2) has a goal of the claimed invention is to off-load processing tasks such as OSPF from the control point 206 to the “network processor directly connected to the control point.”⁶ Therefore, Nagami et al teaches away from the claimed invention.

Therefore, it is respectfully submitted that Nagami et al nowhere discloses, suggests or makes obvious the limitations of claims 1, 7 and 11 and that claims 1, 7 and 11, and claims dependent thereon, patentably distinguish thereover.

⁵ *Id.* at Fig. 4, ref. 207; column 9, line 65 to column 10, line 7.

⁶ Specification at page 3, lines 5-12, and page 4, line 11 to page 5, line 1.

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Conclusions

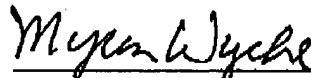
In view of the above, reconsideration and allowance are, therefore, respectfully solicited.

In the event the Examiner believes an interview might serve to advance the prosecution of this application in any way, the undersigned attorney is available at the telephone number noted below.

Applicant believes no fees are due with this request. However, the Director is hereby authorized to charge any fees, or credit any overpayment, associated with this communication, including any extension fees, to Deposit Account No. 50-0563.

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Respectfully submitted,



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